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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR HEARING ON AUGUST 6, 2014 AT 10:00 A.M.

CONTESTED MATTERS

I. SIPC v. BLMIS, et al.; Adv. Pro. No. 08-01789 (SMB)

1. Letter to Trustee and Court re: Notice of Trustee's 12/11/08 Determination of Claim and Madoff Victim Fund filed by Lamar Ellis (Filed: 7/9/2014) [ECF No. 7284]

- 2. July 14, 2014 Letter to Mr. Lamar Ellis (related document 7284) filed by Bik Cheema on behalf of Irving H. Picard (Filed: 7/14/2014) [ECF No. 7359]
- 3. Scheduling Order Signed On 7/17/2014. Re: Letter Filed By Mr. Lamar Ellis (Filed: 7/17/2014) [ECF No. 7418]
- 4. Response to Letter from Trustee re: Notice of Trustee's 12/11/08 Determination of Claim and Madoff Victim Fund (related documents 7284, 7359) filed by Lamar Ellis (Filed: 7/22/2014) [ECF No. 7498]
- 5. July 23, 2014 Letter regarding Scheduling Order to Mr. Lamar Ellis (Filed: 7/23/2014) [ECF No. 7510]

Related Documents:

- 6. Notice of Trustee's Determination of Claim No. 008118, dated 12/8/09
- 7. Notice of Trustee's Determination of Claim No. 070192, dated 11/4/2010
- 8. Response to Trustee's Determination of Claim No. 008118 filed by Lamar Ellis [Filed 12/22/2009] [ECF No. 1112]
- 9. Opposition to Trustee's Determination of Claim No. 008118 [Filed: 9/17/2019] [ECF No. 2998]
- 10. Opposition to Trustee's Determination of Claim filed by Lamar Ellis [Filed: 11/29/2010] [ECF No. 3249]
- 11. Trustee's Third Omnibus Motion to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 3/16/2012) [ECF No. 4732]
- 12. Affidavit of Mailing by John S. Franks regarding Notice of Hearing on Trustee's Third Omnibus Motion to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 3/19/2012) [ECF No. 4737]
- 13. Affidavit of Service by Oleg Bitman regarding Notice of Adjournment of Hearing on Trustee's Third Omnibus Motion to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 4/17/2012) [ECF No. 4768]
- 14. Affidavit of Service by Oleg Bitman regarding Amended Notice of Adjournment of Hearing on Trustee's Third Omnibus Motion to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 4/17/2012) [ECF No. 4772]

- 15. Affidavit of Mailing by Chad M. Tolleson regarding Notice of Adjournment of Hearing on (i) Trustee's First Omnibus Motion t Seeking to Expunge Objections by Parties That Did Not File claim, (ii) Trustee's Second Omnibus Motion Seeking to Expunge Objections by Parties That Did Not File Claims, and (iii) Trustee's Third Omnibus Motion to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 4/18/2012) [ECF No. 4775]
- 16. Order Granting Trustee's Third Omnibus Motion Seeking to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 4/19/2012) [ECF No. 4779]
- 17. Affidavit of Mailing by John S. Franks regarding Order Granting Trustee's Third Omnibus Motion Seeking to Expunge Claims and Objections of Claimants That Did Not Invest with BLMIS or in Entities That Invested in BLMIS (Filed: 4/24/2012) [ECF No. 4792]
- 18. Affidavit of Service regarding July 14, 2014 Letter to Mr. Lamar Ellis (Filed: 7/16/2014) [ECF No. 7405]
- 19. Notice of Adjournment of Hearing on the Letter Request by Mr. Lamar Ellis to August 6, 2014 (Filed: 7/28/2014) [ECF No. 7542]
- 20. Affidavit of Service regarding July 23, 2014 Letter to Mr. Lamar Ellis (Filed: 7/31/14) [ECF No. 7570]
- 21. Affidavit of Service regarding Notice of Adjournment of Hearing on the Letter Request by Mr. Lamar Ellis to August 6, 2014 (Filed: 7/31/14) [ECF No. 7568]

Status: This matter is going forward.

II. <u>Picard v. The Estate (Succession) of Doris Igoin, et al.; Adv. Pro. No. 10-04336 (SMB)</u>

Motion to Dismiss

- 1. Motion to Dismiss Adversary Proceeding (Filed: 4/2/2012) [ECF No. 19]
 - A. Declaration of Jonathan K. Cooperman in Support of Motion to Dismiss (Filed: 4/2/2012) [ECF No. 20]
 - B. Declaration of Laurence Apfelbaum in Support of Motion to Dismiss (Filed: 4/2/2012) [ECF No. 21]
 - C. Declaration of Bruno Quint in Support of Motion to (Filed: 4/2/2012) [ECF No. 22]

D. Memorandum of Law in Support of Motion to (Filed: 4/2/2012) [ECF No. 23]

Replies Filed:

- 2. Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Forum Non Conveniens filed by David J. Sheehan (Filed: 8/3/2012) [ECF No. 30]
 - A. Declaration of Ona T. Wang in Support of the Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss filed by David J. Sheehan (Filed: 8/3/2012) [ECF No. 31]
- 3. Reply Memorandum of Law in Further Support of Motion to Dismiss filed by Jonathan K. Cooperman (Filed: 9/5/2012) [ECF No. 34]
 - A. Reply Declaration of Laurence Apfelbaum in Further Support of Motion to Dismiss filed by Jonathan K. Cooperman (Filed: 9/5/2012) [ECF No. 35]
 - B. Reply Declaration of Bruno Quint in Further Support of Motion to Dismiss filed by Jonathan K. Cooperman (Filed: 9/5/2012) [ECF No. 36]
- 4. Trustee's Sur-Reply in Further Opposition to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and Forum Non Conveniens filed by Ona T. Wang (Filed: 10/1/2012) [ECF No. 43]

Supplemental Briefing:

- 5. Trustee's Supplemental Memorandum of Law in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Forum Non Conveniens filed by Ona T. Wang (Filed: 6/20/2014) [ECF No. 92]
 - A. Supplemental Declaration of Ona T. Wang in Support of Trustee's Opposition to Defendants' Motion to Dismiss filed by Ona T. Wang (Filed: 6/20/2014) [ECF No. 93]
- 6. [Unredacted] Jurisdictional Memorandum of Law in Further Support of Defendants' Motion to Dismiss filed by Jonathan K. Cooperman (Filed: 6/23/2014) [ECF No. 95]
 - A. Declaration of Jonathan K. Cooperman in Further Support of Defendants' Motion to Dismiss Based on Jurisdictional Discovery filed by Jonathan K. Cooperman (Filed: 6/23/2014) [ECF No. 96]

Supplemental Replies Filed:

7. Trustee's Supplemental Reply in Further Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Forum Non Conveniens (related document(s)19) filed

by Ona T. Wang (Filed: 7/18/2014) [ECF No. 100]

A. Memorandum of Law in Response to the Trustee's Supplemental Memorandum of Law and in Further Support of Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and for Forum Non Conveniens filed by Jonathan K. Cooperman (Filed: 7/18/2014) [ECF No. 101]

Additional Documents:

- 8. Letter from Jonathan K. Cooperman to Honorable Judge Lifland in response to the Trustee's letter dated September 11, 2012 filed by Jonathan K. Cooperman (Filed: 9/13/2012) [ECF No. 40]
- 9. December 26, 2012 Letter to Judge Lifland regarding Jurisdictional Discovery filed by Ona T. Wang (Filed: 1/14/2013) [ECF No. 49]
- 10. Letter dated 12/12/12 from Jonathan K. Cooperman to Judge Lifland re: Jurisdictional Discovery filed by Jonathan K. Cooperman (Filed: 1/14/2013) [ECF No. 50]
- 11. Letter dated 1/4/13 from Jonathan K. Cooperman to Judge Lifland in response to 12/28/12 letter by Trustee's counsel and in further support of 12/12/12 letter re: Jurisdictional Discovery filed by Jonathan K. Cooperman (Filed: 1/14/2013) [ECF No. 51]
- 12. Memorandum Endorsement Order signed on 1/15/2013 Denying Defendant's Request for Jurisdictional Discovery (Filed: 1/15/2013) [ECF No. 52]

Status: This matter is going forward.

Dated: New York, New York August 5, 2014 Respectfully submitted,

/s/ Nicholas J. Cremona

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